

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Eason, Adrienne v. Federal Express Corporation

2026 TN WC 18 · No. 2025-60-2340 · Decided March 9, 2026

SUMMARY

The Tennessee Court of Workers' Compensation Claims denied Adrienne Eason's request for medical benefits related to a left-knee mass arising after a 2023 workplace injury. The court held that her petition was untimely under Tennessee Code Annotated § 50-6-203 because it was filed more than one year after the employer's last voluntary benefit payment and that no applicable exception had been shown.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Joshua D. Baker
JURISDICTION	Tennessee Court of Workers' Compensation Claims
DECIDED	March 9, 2026
DOCKET	2025-60-2340
DISPOSITION	other
PROCEDURAL POSTURE	Expedited workers' compensation benefits proceeding concerning a statute-of-limitations defense.
STANDARD OF REVIEW	At an expedited hearing, the court determines whether the employee is likely to prevail at a final hearing.
PRECEDENTIAL VALUE	Published expedited order; the court applied the statutory limitations rule to determine that the employee was unlikely to prevail at a final hearing.
PARTIES	Adrienne Eason v. Federal Express Corporation, Indemnity Insurance Company of North America

TOPICS

- workers compensation
- statute of limitations
- statutory interpretation
- civil procedure

PRACTICE AREAS

- workers compensation
- employment law

QUESTIONS PRESENTED

1. Whether Eason's petition was barred by Tennessee Code Annotated section 50-6-203(b)(2) because it was filed more than one year after the later of the last authorized treatment date or the date the employer ceased paying compensation.

2. Whether the limitations period runs from the date the employer issued its last payment or from the date the payment was received or cleared.
3. Whether any applicable exception to the statute of limitations prevented dismissal or denial of benefits.

HOLDINGS

1. The petition was untimely because it was filed more than one year after the later of the last authorized treatment date and the date Federal Express ceased making compensation payments.
2. The relevant date is the date the employer issued the last payment of compensation, not the date the employee or provider received or cleared it.
3. Eason's date of requesting medical treatment was immaterial because the statute requires the filing of a petition, and she did not present an applicable exception to the limitations defense.

KEY QUOTATIONS

“the right to compensation is forever barred, unless a petition for benefit determination is filed . . . within one (1) year from the latter of the date of the last authorized treatment or the time the employer ceased to make payments of compensation to or on behalf of the employee.” (at 2)

“issuing date of the last payment of compensation by the employer, not the date of its receipt shall constitute the time the employer ceased to make payments of compensation.” (at 2)

FACTUAL BACKGROUND

Eason sustained a work injury on August 2, 2023, and received authorized treatment until August 21, 2023. The claim's last benefits payment was issued on March 8, 2024. After noticing a left-knee mass in October 2024, Eason requested treatment on March 18, 2025, and filed her petition on April 10, 2025.

PROCEDURAL HISTORY

After Federal Express refused to authorize treatment for a left-knee mass, Eason filed a petition for benefit determination on April 10, 2025. Following an expedited hearing on March 4, 2026, the Court of Workers' Compensation Claims denied benefits at that time because Eason was unlikely to prevail at a final hearing.

DISPOSITION

other

CASES CITED

- Carpenter v. Am. Water Heater Co., 2024 TN Wrk. Comp. App. Bd. LEXIS 26, at *6-7 (July 12, 2024)

OPINION

EASON, ADRIANNE v. FEDERAL EXPRESS CORPORATION

2026 TN WC 18

PER CURIAM.

FILED

Mar 09, 2026

01:16 AM(CT)

TENNESSEE COURT OF

WORKERS' COMPENSATION

CLAIMS

TENNESSEE BUREAU OF WORKERS' COMPENSATION
IN THE COURT OF WORKERS' COMPENSATION CLAIMS
AT NASHVILLE

ADRIANNE EASON, Docket No. 2025-60-2340 Employee, v.

FEDERAL EXPRESS

CORPORATION, State File No. 59712-2023 Employer, and

INDEMNITY INSURANCE

COMPANY OF NORTH Judge Joshua D. Baker

AMERICA,

Carrier.

EXPEDITED ORDER DENYING BENEFITS

At an expedited hearing on March 4, 2026, Ms. Eason requested medical treatment for a left-knee mass, which developed after an August 2, 2023 work injury. Federal Express asserted the statute of limitations bars Ms. Eason's claim because she did not file a petition within one year after the last payment on her claim. Because Ms. Eason did not file her petition timely or raise any applicable exceptions to the limitations defense, the Court finds she is unlikely to prevail at a final hearing. Claim History While working for Federal Express on August 2, 2023, Ms. Eason strained her wrists, knees, and right ankle from jumping onto a loading dock to avoid being hit by a cargo tug. She received treatment until August 21, 2023, when her authorized doctor discharged her at maximum recovery. 1 More than a year later, in October 2024, she noticed a lump below her left kneecap. Over the next several months, she tried to doctor it herself. Ultimately, she emailed Federal Express on March 18, 2025, to ask for medical treatment. However, the claim's adjuster refused to authorize treatment because Ms. Eason had not filed a petition within one year from the last payment on her claim. At the hearing, Federal Express entered the adjuster's affidavit into evidence with an attached payment ledger showing the claim's last payment issued March 8, 2024. After Federal Express refused her treatment, Ms. Eason filed her petition on April 10, 2025. Factual Findings and Legal Conclusions The Workers' Compensation Law governs when a petition must be filed where an employer paid benefits voluntarily, as here. Under the statute, "the right to compensation is forever barred, unless a petition for benefit determination is filed . . . within one (1) year from the latter of the date of the last authorized treatment or the time the employer ceased to make payments of compensation to or on behalf of the employee." Tenn. Code Ann. § 50-6-203(b)(2) (2025). Here, Ms. Eason's last date of authorized treatment was August 21, 2023. Federal Express last paid benefits March 8, 2024, making that "the latter" date. Ms. Eason filed her petition more than a year later, on April 10, 2025. Contrary to Ms. Eason's argument at trial, the "issuing date of the last payment of compensation by the employer, not the date of its receipt shall constitute the time the employer ceased to make payments of compensation." *Carpenter v. Am. Water Heater Co.*, 2024 TN Wrk. Comp. App. Bd. LEXIS 26, at *6-7 (July 12, 2024) (citing Tenn. Code Ann. § 50-6-203(c)). In *Carpenter*, issuance of the last voluntary payment of benefits to a medical provider triggered the running of the one-year statute of limitations. Given that, the Court's decision is constrained by the date the last voluntary payment issued rather than the date the check cleared. Further, the date Ms. Eason requested medical treatment is immaterial, where the law requires a petition. Also, Ms. Eason did not present any applicable exceptions to suggest her claim is not barred by the statute of limitations. The Court finds Ms.

Eason is unlikely to prevail at a final hearing given the date Federal Express last paid benefits and the date she filed her petition. 2 It is ORDERED as follows:

1. Ms. Eason's request for benefits is denied at this time.
2. The Court sets a status hearing for Tuesday, April 28, 2026, at 9:30 a.m.

Central Time. The parties must call (615) 741-2113 or (855) 874-0474 to participate. Failure to call might result in a determination of the issues without your participation. ENTERED March 9, 2026.

JUDGE JOSHUA D. BAKER

Court of Workers' Compensation Claims 3

CERTIFICATE OF SERVICE

I certify that a copy of this Order was sent as shown on March 9, 2026. Certified Regular Name Email Sent to Mail mail Adrienne Eason, easonadrienne@gmail.com X Employee Jamie Glass, jamie.glass@qpwblaw.com Jonathan West, jonathan.west@qpwblaw.com X Employer's judy.hamer@qpwblaw.com attorneys
Penny Shrum Clerk, Court of Workers' Compensation

Claims WC.CourtClerk@tn.gov 4 Right to Appeal: If you disagree with the Court's Order, you may appeal to the Workers' Compensation Appeals Board. To do so, you must:

1. Complete the enclosed form entitled "Notice of Appeal" and file it with the Clerk of the Court of Workers' Compensation Claims before the expiration of the deadline. $\frac{3}{4}$ If the order being appealed is "expedited" (also called "interlocutory"), or if the order does not dispose of the case in its entirety, the notice of appeal must be filed within seven (7) business days of the date the order was filed. $\frac{3}{4}$ If the order being appealed is a "Compensation Order," or if it resolves all issues in the case, the notice of appeal must be filed within thirty (30) calendar days of the date the Compensation Order was filed. When filing the Notice of Appeal, you must serve a copy on the opposing party (or attorney, if represented).
2. You must pay, via check, money order, or credit card, a \$75.00 filing fee within ten calendar days after filing the Notice of Appeal. Payments can be made in-person at any Bureau office or by U.S. mail, hand-delivery, or other delivery service. In the alternative, you may file an Affidavit of Indigency (form available on the Bureau's website or any Bureau office) seeking a waiver of the filing fee. You must file the fully-completed Affidavit of Indigency within ten calendar days of filing the Notice of Appeal. Failure to timely pay the filing fee or file the Affidavit of Indigency will result in dismissal of your appeal.
3. You are responsible for ensuring a complete record is presented on appeal. If no court reporter was present at the hearing, you may request from the Court Clerk the audio recording of the hearing for a \$25.00 fee. If you choose to submit a transcript as part of your appeal, which the Appeals Board has emphasized is important for a meaningful review of the case, a licensed court reporter must prepare the transcript, and you must file it with the Court Clerk. The Court Clerk will prepare the record for submission to the Appeals Board, and you will receive notice once it has been submitted. For deadlines related to the filing of transcripts, statements of the evidence, and briefs on appeal, see the applicable rules on the Bureau's website at <https://www.tn.gov/wcappealsboard>. (Click the "Read Rules" button.)
4. After the Workers' Compensation Judge approves the record and the Court Clerk transmits it to the Appeals Board, a docketing notice will be sent to the parties. If neither party timely files an appeal with the Appeals Board, the Court Order becomes enforceable. See Tenn. Code Ann. § 50-6-239(d)(3) (expedited/interlocutory orders) and Tenn. Code Ann. § 50-6-239(c)(7) (compensation orders). For self-represented litigants: Help from an Ombudsman is available at 800-332-2667.

NOTICE OF APPEAL

Tennessee Bureau of Workers' Compensation www.tn.gov/workforce/injuries-at-work/ wc.courtclerk@tn.gov

| 1-800-332-2667 Docket No.: _____ State File No.: _____ Date

of _____ Injury: _____

_____ Employee v.

_____ Employer

Notice is given that _____

[List name(s) of all appealing party(ies). Use separate sheet if necessary.] appeals the following order(s) of

the Tennessee Court of Workers' Compensation Claims to the Workers' Compensation Appeals

Board ;ĐŠĢĐŮ ŽŸĢ Žā ŵŽāĢ ĂĐĐŭ\$ĐĂđ'ŭĢ đ'ŽdzĢĖ ĂŸĖ ŝŸĐŭZĖĢ İŠĢ ĖĂİĢ İŝŭĢT

ƏİĂŵĐĢĖ ŽŸ İŠĢ İŝăƏİ ĐĂŖĢ Žİ İŠĢ ŽăĖĢă;ƏJ đ'ĢŝŸŖ ĂĐĐĢĂŭĢĖĢ] ☞ Expedited Hearing

Order filed on _____ ☞ Motion Order filed on _____ ☞ Compensation Order

filed on _____ ☞ Other Order filed on _____ issued by Judge

_____. Statement of the

Issues on Appeal Provide a short and plain statement of the issues on appeal or basis for relief on appeal:

Parties Appellant(s) (Requesting Party): _____ :Employer

:Employee Address: _____ Phone:

_____ Email: _____

Attorney's Name: _____ BPR#:

_____ Attorney's Email: _____

Phone: _____ Attorney's Address:

_____ * Attach an

additional sheet for each additional Appellant * LB-1099 rev. 01/20 Page 1 of 2 RDA 11082 Employee

Name: _____ Docket No.: _____ Date of Inj.:

_____ Appellee(s) (Opposing Party): _____

:Employer :Employee Appellee's Address: _____ Phone:

_____ Email: _____

Attorney's Name: _____ BPR#:

_____ Attorney's Email: _____

Phone: _____ Attorney's Address:

_____ * Attach an

additional sheet for each additional Appellee *

CERTIFICATE OF SERVICE

I, _____, certify that I have forwarded a

true and exact copy of this Notice of Appeal by First Class mail, postage prepaid, or in any manner as

described in Tennessee Compilation Rules & Regulations, Chapter 0800-02-21, to all parties and/or their

attorneys in this case on this the _____ day of _____, 20 ____.

[Signature of appellant or attorney for appellant]

LB-1099 rev. 01/20 Page 2 of 2 RDA 11082

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